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17 Attorneys for Plaintiff and Counterclaim-Defendant
18 FREESCALE SEMICONDUCTOR, INC.

19
20 UNITED STATES DISTRICT COURT
21
22 NORTHERN DISTRICT OF CALIFORNIA
23
24 SAN JOSE DIVISION

25
26 **Freescale Semiconductor, Inc.,**

27 **Case No. C-09-03689-JF-PVT**

28
29 Plaintiff,

30
31 **STIPULATION AND [PROPOSED]**
32 **ORDER TO ENLARGE TIME FOR**
33 **FREESCALE TO FILE ITS REPLY**
34 **BRIEF**

35
36 v.

37
38 **Date: July 2, 2010**

39 **ChipMOS Technologies, Inc.,**

40
41 **Time: 09:00 a.m.**

42 **Defendant.**

43
44 **Dept: 3, 5th Floor**

45
46 **Judge: Hon. Jeremy Fogel**

47
48 **Complaint filed: July 13, 2009**

49
50 **Trial Date: Not Set**

51
52 **JURY TRIAL DEMANDED**

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54 Pursuant to Local Rules 6-1(b) and 6-2, Plaintiff Freescale Semiconductor, Inc.

55
56 ("Freescale") and Defendant ChipMOS Technologies, Inc. ("ChipMOS") submit this Stipulation
57 to Enlarge Time for Freescale to File its Reply Brief.

58

59
60 **STIPULATION TO ENLARGE TIME FOR**
61 **FREESCALE TO FILE REPLY BRIEF**
62 **C-09-03689-JF-PVT**

WHEREAS ChipMOS filed its Opposition to Freescale's Motion for Summary Judgment on June 14, 2010;

WHEREAS Freescale's response is currently due on June 18, 2010;

WHEREAS the parties stipulated to extend ChipMOS' time to respond its Opposition to Freescale's Motion for Summary Judgment from June 11, 2010 to June 14, 2010 to accommodate the filing of a third party declaration as long as copies of all other papers were delivered to Freescale on June 11, 2020.

WHEREAS ChipMOS has agreed that Freescale can file its response on June 21, 2010;
and

WHEREAS the requested enlargement will not affect any other deadlines.

NOW THEREFORE IT IS HEREBY STIPULATED by the Parties, through their respective counsel of record, subject to the Court's approval, that Freescale is permitted to file its Reply Brief on June 21, 2010.

IT IS SO STIPULATED.

Dated: June 17, 2010

Respectfully submitted,

By: /s/ Greg L. Lippetz

Greg L. Lippetz

State Bar No. 154228

JONES DAY

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Counsel for Plaintiff and
Counterclaim-Defendant
FREESCALE SEMICONDUCTOR, INC.

1 In accordance with General Order No. 45, Section X(B), the above signatory attests that
2 concurrence in the filing of this document has been obtained from the signatory below.

3 Dated: June 17, 2010

Respectfully submitted,

4 PAUL, HASTINGS, JANOFSKY
5 & WALKER LLP
6 RONALD S. LEMIEUX
7 SHANEE Y.W. NELSON
KAREN HU

8 By: /s/ Shanee Y.W. Nelson
SHANEE Y.W. NELSON

9 Counsel for Defendant and Counterclaimant
10 ChipMOS Technologies, Inc.

11 **[PROPOSED] ORDER**

12 Pursuant to the stipulation above, Freescale's deadline to file its Reply Brief is extended to
13 June 21, 2010.

14 **IT IS SO ORDERED.**

15 DATED: 7/2, 2010



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17 Hon. Jeremy Fogel, U.S. District Judge